

**UNITED STATES DEPARTMENT OF TRANSPORTATION  
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION**

1200 New Jersey Avenue, SE  
West Building, W41-326  
Washington, DC 20590

**In re:** )  
 )  
PE14-016 )  
Air Bag Inflator Rupture )  
 )

**AMERICAN HONDA MOTOR CO., INC.'S  
DECEMBER 15, 2014  
RESPONSE TO NHTSA'S SPECIAL ORDER**

This responds to the Special Order issued by NHTSA on November 5, 2014 “as part of NHTSA’s ongoing oversight of [Takata airbag inflator] recalls and its investigation into this defect ...”.

In the short period of time provided to respond to this Special Order, Honda has interviewed numerous witnesses, and reviewed a substantial number of files. The results of Honda’s investigation thus far are reflected in this Response, and in the documents Honda is producing herewith. Given the time constraints, Honda still is in the process of reviewing files in an effort to identify additional responsive materials. Honda will supplement this response as additional responsive materials are identified.

To the extent reasonably practical under the circumstances, information and documents provided in this response are current as of December 5, 2014.

## **REQUESTS**

### **REQUEST:**

1. Provide all communications with Takata that refer to, relate to, discuss or concern the Takata inflators not performing as intended and/or any airbag rupture.

### **RESPONSE:**

1. In response to this request, copies of responsive documents currently in Honda's possession, custody or control that are not protected from disclosure by the attorney-client privilege or attorney work-product protection doctrine and that have been located to date are provided electronically on the concurrently submitted media, which includes a load file field that identifies the Special Order Request categories. Other documents responsive to this request may be contained in documents obtained from the ongoing review of Honda's files and records. If Honda finds additional relevant and non-privileged documents, it will supplement this response.

### **REQUEST:**

2. Provide all internal communications that refer to, relate to, discuss or concern the Takata inflators not performing as intended and/or any airbag rupture.

### **RESPONSE:**

2. In response to this request, copies of responsive documents currently in Honda's possession, custody or control that are not protected from disclosure by the attorney-client privilege or attorney work-product protection doctrine and that have been located to date are provided electronically on the concurrently submitted media, which includes a load file field that identifies the Special Order Request categories. Other documents responsive to this request may be contained in documents obtained from the ongoing review of Honda's files and records. If Honda finds additional relevant and non-privileged documents, it will supplement

this response.

**REQUEST:**

3. Provide all communications with any airbag inflator manufacturer or supplier (other than Takata) that refer to, relate to, discuss or concern the Takata inflators and/or any airbag rupture.

**RESPONSE:**

3. In response to this request, copies of responsive documents currently in Honda's possession, custody or control that are not protected from disclosure by the attorney-client privilege or attorney work-product protection doctrine and that have been located to date are provided electronically on the concurrently submitted media, which includes a load file field that identifies the Special Order Request categories. Other documents responsive to this request may be contained in documents obtained from the ongoing review of Honda's files and records. If Honda finds additional relevant and non-privileged documents, it will supplement this response.

**REQUEST:**

4. Provide all communications with any motor vehicle manufacturer that refer to, relate to, discuss or concern the Takata inflators and/or any airbag rupture.

**RESPONSE:**

4. Honda has not yet located responsive documents for this request. If Honda finds additional relevant and non-privileged documents, it will supplement this response.

**REQUEST:**

5. Provide every Failure Mode and Effects Analysis (FMEA) that refers to, relates to, discusses or concerns: (i) airbag rupture (regardless of the airbag or inflator manufacturer);

or (ii) any Takata airbag or airbag component (including an airbag inflator), which does not or may not perform as intended.

**RESPONSE:**

5. In response to this request, copies of responsive documents currently in Honda's possession, custody or control that are not protected from disclosure by the attorney-client privilege or attorney work-product protection doctrine and that have been located to date are provided electronically on the concurrently submitted media, which includes a load file field that identifies the Special Order Request categories. Other documents responsive to this request may be contained in documents obtained from the ongoing review of Honda's files and records. If Honda finds additional relevant and non-privileged documents, it will supplement this response.

**REQUEST:**

6. Provide all field reports that involve an airbag rupture or that otherwise involve an incident where rapid combustion of the airbag propellant resulted in a rupture or energetic disassembly of the inflator.

**RESPONSE:**

6. In response to this request, copies of responsive documents currently in Honda's possession, custody or control that are not protected from disclosure by the attorney-client privilege or attorney work-product protection doctrine and that have been located to date are provided electronically on the concurrently submitted media, which includes a load file field that identifies the Special Order Request categories. Other documents responsive to this request may be contained in documents obtained from the ongoing review of Honda's

files and records. If Honda finds additional relevant and non-privileged documents, it will supplement this response.

**REQUEST:**

7. Provide a list of all warranty claims that involve an airbag rupture or that otherwise involve an incident where rapid combustion of the airbag propellant resulted in a rupture or energetic disassembly of the inflator.

**RESPONSE:**

7. Honda has located no responsive documents.

**REQUEST:**

8. Provide all Honda product and/or design standards for airbag inflators in effect from January 1, 1998 to the present.

**RESPONSE:**

8. In response to this request, copies of responsive documents currently in Honda's possession, custody or control that are not protected from disclosure by the attorney-client privilege or attorney work-product protection doctrine and that have been located to date are provided electronically on the concurrently submitted media, which includes a load file field that identifies the Special Order Request categories. Other documents responsive to this request may be contained in documents obtained from the ongoing review of Honda's files and records. If Honda finds additional relevant and non-privileged documents, it will supplement this response.

**REQUEST:**

9. Provide all standards and specifications for airbag inflators provided by Honda to Takata between January 1, 1998 and the present.

**RESPONSE:**

9. In response to this request, copies of responsive documents currently in Honda's possession, custody or control that are not protected from disclosure by the attorney-client privilege or attorney work-product protection doctrine and that have been located to date are provided electronically on the concurrently submitted media, which includes a load file field that identifies the Special Order Request categories. Other documents responsive to this request may be contained in documents obtained from the ongoing review of Honda's files and records. If Honda finds additional relevant and non-privileged documents, it will supplement this response.

**REQUEST:**

10. Provide all documents that refer or relate to concerns or allegations (regardless of whether or not such concerns or allegations were substantiated) by any Honda employee or contractor that any Takata airbag or airbag component (including an airbag inflator) was defective or improperly manufactured.

**RESPONSE:**

10. Honda objects to this request on the grounds that it purports to include all past and present employees of Honda. Without waiving this objection, in response to this request, copies of responsive documents currently in Honda's possession, custody or control that are not protected from disclosure by the attorney-client privilege or attorney work-product protection doctrine and that have been located to date are provided electronically on the concurrently submitted media, which includes a load file field that identifies the Special Order Request categories. Other documents responsive to this request may be contained in documents obtained from the ongoing review of Honda's files and records. If Honda finds additional

relevant and non-privileged documents, it will supplement this response.

**REQUEST:**

11. Provide a roster of all Honda vehicles recalled for airbag rupture including, but not limited to, Recall Nos. 08V-593, 09V-259, 10V-041, 11V-260, 13V-132, 14V-349, and 14V351 and 14V-353 (both of which were referred to by Honda as a "Regional Service Campaign"). Include in your answer the model, model year, VIN, location where the vehicle is registered, product specifications for the airbag and inflator modules in each vehicle, and whether the recall remedy was performed.

**RESPONSE:**

11. In response to this request, the requested information is provided electronically on the concurrently submitted media, which includes a load file field that identifies the Special Order Request categories. In addition to the recalls identified in the request, Honda has also identified Recall 02V-080 as responsive to this request, and will supplement this response with the requested roster for that Recall.

**REQUEST:**

12. Identify each incident in which an airbag rupture has occurred, or is alleged to have occurred, in a Honda vehicle, of which Honda is aware, by any means (including but not limited to media reports), regardless of whether there was a death, injury or property damage. Include in your answer the model, model year, VIN, location where the vehicle is registered, and product specifications for the airbag and inflator modules in each vehicle.

**RESPONSE:**

12. Honda objects to this request on the grounds that it is unreasonable to expect that Honda can identify every incident contained in any media report, particularly given that

the definition of "Honda" in the Special Order includes all past and present employees of Honda. Without waiving this objection, the requested information is provided electronically on the concurrently submitted media, which includes a load file field that identifies the Special Order Request categories. Honda has also identified certain contacts made to the Customer Relations Group alleging rupture, and information related to these incidents will be included in the first Supplement to this response. If Honda finds additional relevant and non-privileged documents, it will supplement this response.

**REQUEST:**

13. For each incident identified in your response to Request No. 12, provide a copy of any documents related to Honda's assessment of the incident and any documents that Honda gathered as part of its investigation of the incident (including any police accident report).

**RESPONSE:**

13. In response to this request, copies of responsive documents currently in Honda's possession, custody or control that are not protected from disclosure by the attorney-client privilege or attorney work-product protection doctrine and that have been located to date are provided electronically on the concurrently submitted media, which includes a load file field that identifies the Special Order Request categories. Other documents responsive to this request may be contained in documents obtained from the ongoing review of Honda's files and records. If Honda finds additional relevant and non-privileged documents, it will supplement this response.

**REQUEST:**

14. Provide all documents that refer to, relate to, discuss or concern any incident involving a death and/or injury in which an airbag rupture has occurred, or is



suspected or alleged to have occurred.

**RESPONSE:**

14. In response to this request, copies of responsive documents currently in Honda's possession, custody or control that are not protected from disclosure by the attorney-client privilege or attorney work-product protection doctrine and that have been located to date are provided electronically on the concurrently submitted media, which includes a load file field that identifies the Special Order Request categories. Other documents responsive to this request may be contained in documents obtained from the ongoing review of Honda's files and records. If Honda finds additional relevant and non-privileged documents, it will supplement this response.

**REQUEST:**

15. Provide a list of every lawsuit naming Honda as a defendant that is based, in whole or in part, on the occurrence or alleged occurrence of an airbag rupture. For each lawsuit, provide the full case caption (including case number and jurisdiction) and describe the current status of the lawsuit. Also include in your answer the following information: (i) the date on which the alleged incident occurred; (ii) the date on which the lawsuit was filed; (iii) if resolved, the date and nature of the resolution; and, (iv) the settlement amount, if any.

**RESPONSE:**

15. In response to this request, the requested information is provided electronically on the concurrently submitted media, which includes a load file field that identifies the Special Order Request categories. If Honda finds additional relevant and non-privileged documents, it will supplement this response.

**REQUEST:**

16. For each lawsuit identified in your response to Request No. 15, provide the complaint and any amended complaint(s), Honda's answer and any amended answer(s), all interrogatory responses by Honda, all deposition and trial transcripts, all expert reports, all technical analyses of the claims (whether internal to Honda or produced in the litigation), all dispositive motions related to Honda, all opinions concerning dispositive motions related to Honda, all demand letters and responses, and all settlement agreements.

**RESPONSE:**

16. In response to this request, copies of responsive documents currently in Honda's possession, custody or control that are not protected from disclosure by the attorney-client privilege or attorney work-product protection doctrine and that have been located to date are provided electronically on the concurrently submitted media, which includes a load file field that identifies the Special Order Request categories. Other documents responsive to this request may be contained in documents obtained from the ongoing review of Honda's files and records. If Honda finds additional relevant and non-privileged documents, it will supplement this response.

**REQUEST:**

17. Provide a list of every pre-suit legal claim that is based, in whole or in part, on the occurrence or alleged occurrence of an airbag rupture. Include in your answer: (i) the name of the claimant; (ii) the name of the claimant's counsel, if any; (iii) the date on which the alleged incident occurred; (iv) the date on which the claim was asserted; (v) a description of the nature of the claim; and, (vi) a description of the current status of the claim. In addition, for any claim that

has been resolved, state the date of such resolution, describe the nature of the resolution as to Honda, and identify the amount of the settlement, if any.

**RESPONSE:**

17. In response to this request, the requested information is provided electronically on the concurrently submitted media, which includes a load file field that identifies the Special Order Request categories. Other documents responsive to this request may be contained in documents obtained from the ongoing review of Honda's files and records. If Honda finds additional relevant and non-privileged documents, it will supplement this response.

**REQUEST:**

18. For each pre-suit legal claim identified in your response to Request No. 17, provide a copy of any written documentation of the allegations, all technical analyses of the claims (whether internal to Honda, provided by Honda to the claimant, or provided by the claimant to Honda), all demand letters and responses, and all settlement agreements.

**RESPONSE:**

18. In response to this request, copies of responsive documents currently in Honda's possession, custody or control that are not protected from disclosure by the attorney-client privilege or attorney work-product protection doctrine and that have been located to date are provided electronically on the concurrently submitted media, which includes a load file field that identifies the Special Order Request categories. Other documents responsive to this request may be contained in documents obtained from the ongoing review of Honda's files and records. If Honda finds additional relevant and non-privileged documents, it will supplement this response.

**REQUEST:**

19. Provide a list of all subpoenas directed to Honda that request documents or information relating to airbag ruptures. For each subpoena, provide the full case caption (including case number and jurisdiction) for the lawsuit in which it was issued.

**RESPONSE:**

19. Honda has located no responsive documents.

**REQUEST:**

20. For each subpoena identified in your response to Request No. 19, provide a copy of all motions to quash, documents produced in response to the subpoena, and transcripts of testimony pursuant to the subpoena.

**RESPONSE:**

20. Honda has located no responsive documents.

**REQUEST:**

21. Identify all insurance policies providing liability coverage for the lawsuits and claims asserted against Honda in Request Nos. 15 through 19.

**RESPONSE:**

21. Honda identifies the following insurance policies, subject to the date of loss for any alleged incident:

- a. Berkshire Hathaway International Insurance Ltd., Policy No. 495855.
- b. Tokio Marine Specialty Insurance Company, c/o Philadelphia Insurance Companies, Policy No. E-339-73-33.
- c. Mitsui Sumitomo Insurance Company of America, Policy No. EXS-5000208.
- d. Swiss Re America Holding Corporation North American Capacity Insurance

Company, Policy Nos. EXS-2000060-00 and EXS-2000061-00.

- e. XL Insurance (Bermuda) Ltd., Policy No. XLUMB-601163.
- f. General Security Indemnity Company of Arizona (SCOR), Policy No. 2013-10F131839-1.
- g. Arch Reinsurance Ltd., Policy No. URP-0018072-00.
- h. ACE Bermuda Insurance, Ltd., Policy No. HMC-5143/5.

**REQUEST:**

22. Provide all documents that Honda submitted to any insurer(s) that refer to, relate to, discuss, or concern airbag rupture.

**RESPONSE:**

22. In response to this request, copies of responsive documents currently in Honda's possession, custody or control that are not protected from disclosure by the attorney-client privilege or attorney work-product protection doctrine and that have been located to date are provided electronically on the concurrently submitted media, which includes a load file field that identifies the Special Order Request categories. Other documents responsive to this request may be contained in documents obtained from the ongoing review of Honda's files and records. If Honda finds additional relevant and non-privileged documents, it will supplement this response.

**REQUEST:**

23. Provide all chronologies, timelines and/or summaries of events that refer to, relate to, discuss or concern airbag rupture(s), regardless of whether prepared by Honda or provided to Honda by any third party.

**RESPONSE:**

23. In response to this request, copies of responsive documents currently in Honda's possession, custody or control that are not protected from disclosure by the attorney-client privilege or attorney work-product protection doctrine and that have been located to date are provided electronically on the concurrently submitted media, which includes a load file field that identifies the Special Order Request categories. Other documents responsive to this request may be contained in documents obtained from the ongoing review of Honda's files and records. If Honda finds additional relevant and non-privileged documents, it will supplement this response.

**REQUEST:**

24. Provide all audits that refer or relate to Takata's production of airbags or airbag components, regardless of whether they were performed by Honda, Takata or a third party.

**RESPONSE:**

24. In response to this request, copies of responsive documents currently in Honda's possession, custody or control that are not protected from disclosure by the attorney-client privilege or attorney work-product protection doctrine and that have been located to date are provided electronically on the concurrently submitted media, which includes a load file field that identifies the Special Order Request categories. Honda also refers NHTSA to its response to Request No. 31 for additional related information. Other documents responsive to this request may be contained in documents obtained from the ongoing review of Honda's files and records. If Honda finds additional relevant and non-privileged documents, it will supplement this response.

**REQUEST:**

25. Provide Honda's assessment of Takata's recordkeeping processes, including, but

not limited to, Takata's ability to track propellant lots and match them to specific inflators.

**RESPONSE:**

25. Honda is aware of three instances in which lapses in Takata's recordkeeping processes have affected negatively Takata's ability to track propellant lots to match them to specific inflators. These instances -- one that occurred at the Moses Lake, Washington propellant manufacturing facility in September - October 2000, and one at the LaGrange, Georgia, module manufacturing facility from November 2000 - November 2001 -- resulted in Recall 09V-259 and Recall 11V-260 respectively. An additional instance was due to a fire at Takata's Monclova, Mexico inflator manufacturing facility in 2006.

As NHTSA is aware, after a detailed investigation, Takata concluded that the 2007 driver airbag inflator ruptures occurred as a result of the effect of excess moisture exposure during the inflator manufacturing process coupled with thermal exposure. This finding resulted in Recall 08V-593 in November 2008. Continued investigation and subsequent events, however, revealed that this causation determination was incorrect. In June 2009, Takata concluded, based upon its testing and analysis, that the cause of the reported field events was low density of the wafers manufactured by the Stokes press at the Moses Lake, Washington propellant facility. This determination resulted in Recall 09V-259.

However, in the interim Honda became aware of Case 5 in May 2009. The inflator in Case 5, according to Takata's records, contained a wafer produced on the Gladiator 2 press, not the Stokes press. An analysis of Takata's recordkeeping revealed that Takata was unable to track its propellant lots with certainty. Consequently, Takata concluded that even though its records indicated that the propellant in the Case 5 vehicle was part of a wafer/batwing lot

produced using the Gladiator 2 press, it more likely than not was actually produced on a Stokes press. As a result, Honda chose to expand the scope of Recall 09V-259 to include all vehicles with inflators manufactured at the Moses Lake facility during the time period that the Stokes press was operational and, therefore, could have been produced using a Stokes press, even if Takata's records indicated that the propellant was produced on the Gladiator 2 press.

The second known lapse in Takata's recordkeeping occurred in its LaGrange, Georgia inflator facility. Honda learned of Case 18 in August of 2011. According to Takata's records, the inflator lot control records showed Gladiator 1 press production for the propellant wafers/batwings. The Gladiator 1 press had not been involved in previous recalls and this revelation initiated a deeper investigation by Takata. On September 14, 2011 and October 13, 2011, Takata made presentations to Honda detailing its examination of trace records related to Case 18, and its ultimate conclusion that for some number of inflators manufactured at LaGrange for which records indicated Gladiator 1 press propellant lots, in fact, Stokes press propellant lots were used. See PSDI Event 18 Review Meeting presentation (09.14.2011); Honda PSDI "Case 18" Follow up Meeting presentation (10.13.2011). As a result of these recordkeeping lapses, Honda expanded Recall 11V-260 to include all inflators built until the end of Stokes press propellant production regardless of the propellant press indicated in Takata's records.

Honda notes that one of the reasons for the inability to track clearly the propellant lots, the length of time needed to investigate propellant issues, and the later determination of the recordkeeping lapses was due to the fact that the propellant tracking records created at Takata's Moses Lake plant during the relevant time period were handwritten hard copy documents. Reviewing the handwritten records proved to be time-consuming and difficult. The records



were often difficult to read, contained ambiguous marks and notations, and required interpretation. These handwritten notes hampered Takata's accessibility to the data needed to trace the propellant lots. Takata's use of handwritten records during the relevant time period made assessment of what inflators were potentially problematic particularly challenging during Takata's subsequent root cause analysis of ruptures from inflators with propellant manufactured during this time.

Honda also recognizes that some records were destroyed in a fire at Takata's Monclova, Mexico factory on March 30, 2006. This loss affected Takata's ability to analyze issues that arose with its passenger airbag inflators. Finally, as discussed in response to Request 26, Honda learned that Takata's recordkeeping processes, and in particular the use of handwritten paper records, hindered its ability to determine which inflators contained propellant manufactured during the period when the auto-reject function on Gladiator presses could be turned off by the press operator. Takata's recordkeeping issues required Honda to expand Recall 13V-132 in June 2014 as Recall 14V-349.

**REQUEST:**

26. State whether Takata supplied Honda with inflators containing propellant produced using machinery whose "auto-reject" function could be turned off, thereby creating an opportunity for substandard propellant produced by this machinery to be incorporated into production inflators. If the answer to the foregoing is in the affirmative, state when Honda learned of the occurrence(s) of such production, how Honda learned of the occurrence(s) and what information was available to Honda to identify inflators produced by machinery whose "auto reject" function had been disabled.

**RESPONSE:**

26. Yes. Takata supplied Honda with inflators containing propellant produced using machinery whose auto-reject function could be turned off by the press operator, thereby creating an opportunity for substandard propellant produced by this machinery to be incorporated into production inflators. On October 20, 2011, Honda learned of an incident in Puerto Rico involving a passenger airbag inflator rupture. After consulting with NHTSA, Honda began collecting healthy passenger airbag modules for testing by Takata in support of this investigation.

On July 9-10, 2012, Honda representatives from a team from Honda R&D Co., Ltd., (“HGT”), as well as representatives of American Honda Motor Co., Ltd. (“AHM”), Honda of America Mfg., Inc. (“HAM”) and Honda Motor Co., Ltd. (“HMC”), also visited Takata’s Moses Lake, Washington propellant manufacturing facility to investigate the cause of the passenger airbag inflator rupture. While there, Honda and Takata employees interviewed Takata associates who had worked and were currently working at the plant and observed Takata engineers retrofit the existing Gladiator press to match the conditions present at the time of the manufacture of the propellant at issue (March 26, 2001). Takata relied upon various equipment and maintenance records to return the press in every aspect possible to a 2000-era condition. Through that work, Takata identified that the auto-reject function could be overridden by the press operator. As described below, as a result of this realization, Takata and Honda began to understand that there was a potential for propellant produced in the early 2000 time frame to have been produced with the Gladiator press’ auto-reject function manually switched off.

Once propellant was produced with the retrofitted press[es], Takata conducted a

series of "worst case scenario" analyses to determine the root cause of the passenger airbag rupture. On November 21, 2012, Takata informed Honda that its investigation of healthy parts revealed that abnormal combustion in the passenger airbag module inflator was possible, but the cause could not be determined. In December 2012, Takata informed members of HGT that the "auto-reject" function of its machine at its Moses Lake, Washington propellant manufacturing facility may have been turned off by press operators at unknown times. On February 8, 2013, a meeting was held with NHTSA to discuss the ongoing investigation. After further analysis, Takata subsequently concluded in March that the auto-reject function may have been turned off during 2001 – 2002 production periods and that it was possible for propellant produced during 2001- 2002 to be manufactured out of specification without manufacturing processes correctly identifying and removing the out of specification propellant.

Specifically, Takata has indicated that beginning in September 2001, it utilized an automatic rejection function to detect and reject propellant wafers with inadequate compression by monitoring the compression load that had been applied. However, for the next year, that function could be turned on and off manually by the machine operator in the plant. Takata also informed Honda that no later than September 12, 2002, the machine was modified by the addition of an interlock feature that precluded the operator from manually turning off the automatic rejection function during production of propellant wafers. Consequently, Takata informed Honda that some propellant wafers produced at Takata's plant in Moses Lake, Washington between April 13, 2000 and September 11, 2002 may have been produced with an inadequate compaction force and thus the propellant could potentially deteriorate over time due to environmental factors, which

could lead to over-aggressive combustion in the event of an airbag deployment which could cause the body of the inflator to rupture. See letter to NHTSA from Takata dated April 11, 2013.

Takata module assembly production records include the serial numbers of each inflator. Using this information, the Honda factory that installed the airbag modules into vehicles matched the airbag inflator module serial number to the VIN of the vehicle in which it was installed. This is the method of determining the recall population. Honda notes that Recall 13V-132 also included vehicles that potentially contained inflators manufactured at the Monclova Plant during a time period during which the propellant may have absorbed moisture in the inflator process. See NASC presentation dated March 26, 2013.

On June 11, 2014, Takata notified HGT that there was a possibility that production records of the automatic rejection function used in determining the previous recall range may have been incorrect or incomplete. Takata also informed Honda that the methodology used to identify the range of affected airbag inflators was inadequate. As discussed above, based upon the inflator and airbag module assembly production records information provided by Takata, Honda was able to identify the VINs of the vehicles in which the potentially affected inflators had been installed and expanded safety recall 13V-132 to include those vehicles.

**REQUEST:**

27. State whether Honda has conducted any testing, or requested that testing be conducted by a third party on behalf of Honda, involving or relating to airbag ruptures. Include in your answer a description of the testing conducted, the date on which such testing

occurred, and the testing result(s).

**RESPONSE:**

27. Yes. For the past seven years Honda has cooperated in testing conducted by Takata and other third parties to evaluate the root cause of airbag ruptures. Honda's role in the various testing conducted over the past seven years is described more fully in American Honda Motor Co., Inc. December 5, 2014 response, as amended and supplemented on December 15, 2014, to NHTSA's General Order, incorporated herein by reference. In addition, Honda has recently announced its intention to participate with other vehicle manufacturers in a joint industry project to retain an independent engineering firm to evaluate the Takata inflator rupture issue and provide expert assistance in understanding root cause.

**REQUEST:**

28. Provide all documents that refer to, relate to, discuss or concern airbag rupture testing regardless of whether the testing was performed by Honda, Takata or a third party.

**RESPONSE:**

28. In response to this request, copies of responsive documents currently in Honda's possession, custody or control that are not protected from disclosure by the attorney-client privilege or attorney work-product protection doctrine and that have been located to date are provided electronically on the concurrently submitted media, which includes a load file field that identifies the Special Order Request categories. Honda also refers NHTSA to documents produced in conjunction with American Honda Motor Co., Inc. December 5, 2014 response, as amended and supplemented on December 15, 2014, to NHTSA's General Order, incorporated herein by reference. Other documents responsive to this request may be contained in

documents obtained from the ongoing review of Honda's files and records. If Honda finds additional relevant and non-privileged documents, it will supplement this response.

**REQUEST:**

29. State whether Honda has performed any investigation, or requested that an investigation be conducted by a third party on behalf of Honda, involving or relating to airbag rupture. Include in your answer a description of the nature and results of the investigation.

**RESPONSE:**

29. Honda technical specialists have performed limited investigations into field incidents of alleged airbag inflator ruptures, including but not limited to inspections of vehicles and photographic documentation of the vehicles and airbag modules. Honda also refers NHTSA to American Honda Motor Co., Inc. December 5, 2014 response, as amended and supplemented on December 15, 2014, to NHTSA's General Order, incorporated herein by reference. In addition, Honda has recently announced its intention to participate with other vehicle manufacturers in a joint industry project to retain an independent engineering firm to evaluate the Takata inflator rupture issue and provide expert assistance in understanding root cause.

**REQUEST:**

30. Provide all documents that refer to, relate to, discuss or concern any investigation into the airbag rupture issue described in Request No. 29 regardless of whether the investigation was conducted by Honda, Takata or a third party.

**RESPONSE:**

30. In response to this request, copies of responsive documents currently in

Honda's possession, custody or control that are not protected from disclosure by the attorney-client privilege or attorney work-product protection doctrine and that have been located to date are provided electronically on the concurrently submitted media, which includes a load file field that identifies the Special Order Request categories. Honda also refers NHTSA to documents produced in conjunction with American Honda Motor Co., Inc. December 5, 2014 response, as amended and supplemented on December 15, 2014, to NHTSA's General Order, incorporated herein by reference. Other documents responsive to this request may be contained in documents obtained from the ongoing review of Honda's files and records. If Honda finds additional relevant and non-privileged documents, it will supplement this response.

**REQUEST:**

31. State whether Honda sent any employees to visit or inspect Takata production facilities in the United States or Mexico between January 1, 2000 and the present. Include in your answer: (i) the names and titles of such employees; (ii) the Takata facility visited; (iii) the purpose of the visit or inspection; and, (iv) the dates on which such visits or inspections occurred.

**RESPONSE:**

31. Personnel from Honda's North American manufacturing plants, including HAM, Honda Manufacturing of Alabama, LLC ("HMA"), Honda Manufacturing of Indiana, LLC, ("HMIN"), Honda of Canada Mfg ("HCM"), and Honda De Mexico S.A. de C.V. ("HDM") periodically visit Takata's United States and Mexico production facilities (just as they periodically visit other supplier facilities) to conduct Quality Assurance Visits and New Model Reviews. Occasionally, personnel from HMC participate in these visits, as well. The

Honda companies conduct Quality Assurance Visits ("QAV") in accordance with the guidelines of the Supplier Quality Manual.

As noted earlier in this response, these factory visits serve both a new model and mass production functions. There is a new model function and a mass production function to these factory visits. The purpose of QAV visits is for Honda personnel to audit the supplier processes and/or systems, both to judge whether the supplier is meeting minimum requirements of quality assurance and to promote continuous improvement of the supplier processes and/or systems so that Honda products can maintain their competitive edge.

With regard to a new model or part review, personnel from the engineering staff of the Honda factory for which the part is being manufactured visit the supplier facility at certain milestones in the initial production process to understand the supplier's process and to confirm that controls are in place to ensure that the part meets Honda's specifications. Personnel from Honda's North American factories would have visited Takata's U.S. and Mexico facilities between 2000 and the present whenever a new model part was being manufactured. For mass production parts, personnel from the Purchasing Operations of the Honda manufacturing plant may visit the plant either to support a systems audit or to address a specific concern.

In addition, personnel from various Honda entities have visited Takata's production facilities over the past seven years as part of Honda's efforts to understand the root cause of the airbag module inflator events at issue. On August 9-11, 2009, representatives of AHM visited the Moses Lake facility along with representatives from HAM, Honda R&D Americas, Inc. (HRA-O) and HGT. The purpose of the visit was to observe the factory and machines that were producing the propellant batwings/wafers that would be put in airbag



inflators manufactured at other Takata plants and to understand what the production process was in the 2000-2002 time frame.

On November 13-17, 2009, representatives of HAM, HCM and HGT visited the Moses Lake facility to discuss the inflator rupture issue and to strive to understand the root cause. On January 12, 2010, representatives of HMC and HGT followed up with a visit to the Moses Lake facility for the same purpose.

On March 24, 2010, representatives of HMC and HGT visited the Monclova facility to discuss why Takata believed that the PSDI inflator was not at risk for rupture.

On March 28-31, 2010, representatives of HAM, HRA-O, HCM, HMC and HGT visited Takata's Moses Lake Facility for meetings related to the 2001 Accord/Civic inflator rupture issue and to discuss why Takata believed that the PSDI inflator was not at risk for rupture.

On May 28-29, 2012, representatives of HGT and HMC visited Takata's Monclova facility to discuss the root cause of the Saudi Arabian incident of inflator rupture.

As discussed in response to Request 26, Honda representatives from AHM, HAM, HGT and HMC also visited Takata's Moses Lake, Washington facility on July 9-10, 2012. The purpose of the visit was to understand the features of the Gladiator presses used to shape propellant into wafers that generate the gas that inflates frontal airbags upon commanded deployment, including the presses' auto-reject feature, and to learn about past, current, and future calibration processes, settings, and maintenance procedures for the Gladiator presses. During this visit, Takata and Honda personnel discussed the auto-reject function of the Gladiator press and its functioning during the early 2000s time period.

On September 6-10, 2012, representatives of HGT and HMC visited the Moses Lake facility to understand better the manufacturing conditions in the 2000-2001 time frame.

On February 15-16, 2013, representatives of HMC and HGT visited the Moses Lake facility to understand better the operations of the press machinery (Gladiator).

On December 12-15, 2013, representatives of HMC, HGT and AHM visited the Monclova facility to discuss the issue of whether there could be sealing damage to the PSDI model inflator.

An AHM representative also visited the Moses Lake facility between February 18 – 20, 2014 for meetings related to the airbag inflator rupture issue.

On April 16-18, 2014, an HGT representative visited the Moses Lake facility to discuss the issue of moisture getting into the inflator canisters.

On August 6-8, 2014, a representative of HMC visited the Monclova facility to discuss the confirmation of the countermeasure with respect to a competitor's field action.

Honda is working to collect more detailed information responsive to this Request at this time through employee interviews and document collection. Honda will supplement this response appropriately with additional information and documentation as it is collected.

**REQUEST:**

32. State whether Honda assigned any employee(s) to monitor and/or inspect the quality of inflators produced by Takata and/or inflator propellant(s) originating from Takata production facilities in the United States or Mexico between January 1, 2000 and the present. Include in your answer: (i) the names and titles of such employees; (ii) the Takata product at issue; (iii) the manner and methodology of the monitoring and/or inspection; and, (iv) the time period(s) during which the particular employee performed the foregoing activities.

**RESPONSE:**

32. See Honda's Response to Requests 24 and 31.

**REQUEST:**

33. State whether Honda provided any quality control or engineering assistance to Takata relating to the Takata inflators. If the answer to the foregoing is in the affirmative, describe these activities in detail, including, but not limited to: (i) the names and titles of Honda employees providing this assistance; (ii) the nature of this assistance; (iii) the dates on which such assistance was provided; and, (iv) whether any Honda employees provided such assistance at Takata production facilities in the United States or Mexico.

**RESPONSE:**

33. Honda has provided some engineering assistance to Takata relating to Takata inflators. Honda is currently working to obtain further information regarding the assistance provided through employee interviews and document collection. Honda will supplement this response appropriately with additional information and documentation as it is collected.

**REQUEST:**

34. Provide a list of all recalls being conducted outside of the United States for Honda vehicles equipped with the Takata inflators that have been recalled by Honda in the United States.

**RESPONSE:**

34. Honda understands this request to relate to recalls with regard to front airbag inflator rupture. In response to this request, Honda identifies the following recalls conducted by Honda outside of the United States:

Date Commenced	Foreign Recall No.	Honda Vehicles Recalled	Country(ies) Campaign Conducted In		Description
11/14/2014	14F-102	<ul style="list-style-type: none"> <li>• Certain 2004 Honda Civic vehicles</li> <li>• Certain 2004 Honda Fit, Jazz vehicles</li> <li>• Certain 2005 Honda Fit vehicles</li> <li>• Certain 2003 Honda Fit ARIA, Fit Saloon City vehicles</li> <li>• Certain 2004 Honda Fit ARIA, Fit Saloon City vehicles</li> <li>• Certain 2005 Honda Fit ARIA, Fit Saloon City vehicles</li> <li>• Certain 2006 Honda Fit ARIA vehicles</li> <li>• Certain 2007 Honda Fit ARIA vehicles</li> <li>• Certain 2008 Honda Fit ARIA vehicles</li> <li>• Certain 2002 Honda That's vehicles</li> </ul>	Africa Others Algeria Angola Australia Austria Bahrain Belgium Benin Brunei Darussalam Bulgaria Cote D'Ivoire Croatia Cyprus Czech Czech Republic Denmark Egypt Estonia Ethiopia Finland France Gabon Germany Ghana Greece Hong Kong Hungary Iceland Indonesia Ireland Israel Italy La Reunion Laos Latvia	Lebanon Lithuania Macedonia Malaysia Morocco Netherlands New Zealand Nigeria NME countries Norway Oman Philippines Poland Portugal Qatar Russia Russia Saudi Arabia Seychelles Singapore Slovakia Slovenia South Africa Spain Sudan Sweden Switzerland Syrian Arab Republic Thailand Turkey Turkey Ukraine Ukraine United Arab Emirates United Kingdom	During the manufacturing of certain driver's airbag inflators by the supplier, humidity may not have been properly controlled on the assembly line. If the assembly line were stopped temporarily, the propellant may have been exposed to air in an uncontrolled environment, increasing the likelihood for the propellant to absorb moisture. Propellant that has absorbed moisture may result in an increase in the internal pressure during a deployment, causing the inflator to rupture.
08/29/2014	14F-070	<ul style="list-style-type: none"> <li>• Certain 2012 Honda CR-V vehicles</li> <li>• Certain 2013 Honda CR-V vehicles</li> <li>• Certain 2014 Honda CR-V vehicles</li> <li>• Certain 2012 Honda Civic vehicles</li> <li>• Certain 2013 Honda Civic vehicles</li> <li>• Certain 2014 Honda Civic vehicles</li> <li>• Certain 2015 Honda Civic vehicles</li> <li>• Certain 2012 Honda Brio vehicles</li> </ul>	Argentina Armenia Aruba Azerbaijan Bahamas Bahrain Bangladesh Barbados Belarus Bolivia Brazil Brunei Darussalam Cayman Islands Chile China	Kazakhstan Korea Kuwait Lebanon Malaysia Mexico New Zealand Nicaragua Nigeria Oman Pakistan Panama Paraguay Peru Philippines Qatar	An incorrect baffle may have been used during the assembly of the driver's airbag inflator. An incorrect baffle may not allow gas to escape during an airbag deployment therefore increasing internal pressure. If an airbag deploys with excessive

Date Commenced	Foreign Recall No.	Honda Vehicles Recalled	Country(ies) Campaign Conducted In		Description
		<ul style="list-style-type: none"> <li>• Certain 2013 Honda Brio vehicles</li> <li>• Certain 2014 Honda Brio vehicles</li> <li>• Certain 2013 Honda Amaze vehicles</li> <li>• Certain 2014 Honda Amaze vehicles</li> </ul>	Colombia Costa Rica Dominican Republic El Salvador Ethiopia Fiji Ghana Grenada Guatemala Honduras Hong Kong India Indonesia Iraq Jamaica Jordan	Russia Saint Kitts Saudi Arabia Singapore Sri Lanka Suriname Taiwan Thailand Trinidad And Tobago Ukraine United Arab Emirates Uruguay Vietnam Yemen	internal pressure it may cause the inflator to rupture.
07/01/2010 (08/20/2010 for expansion)	10F-055	<ul style="list-style-type: none"> <li>• Certain 2001 – 2003 Honda Civic vehicles</li> <li>• Certain 2002 Honda Fit vehicles</li> <li>• Certain 2001-2003 Honda Stream vehicles</li> </ul>	Antigua Argentina Aruba Australia Bahamas Bahrain Barbados Belgium Benin Brazil Brunei Ceuta (Spain) Chile China Columbia Costa Rica Croatia Cyprus (Stream only) Czech Denmark Dominican Republic Ecuador El Salvador Estonia Fiji Finland Germany Ghana Gibraltar Grand Cayman Greece Guatemala Honduras Hong Kong Hungary Iceland	Latvia Lebanon Malaysia Mauritius Mexico Morocco N. Cyprus Nepal Netherlands New Zealand Nicaragua Nigeria Norway (Stream only) Oman Panama Paraguay Peru Philippines Poland Portugal Qatar Russia Saudi Arabia Singapore Slovenia (Stream only) South Africa Spain Sri Lanka Suriname Sweden (Stream only) Switzerland (Stream only)	In certain vehicles, the single-stage passenger airbag inflator could produce excessive internal pressure. If an affected airbag deploys, the increased internal pressure may cause the inflator housing to rupture. Metal fragments could pass through the airbag cushion material possibly causing injury or death to vehicle occupants.

Date Commenced	Foreign Recall No.	Honda Vehicles Recalled	Country(ies) Campaign Conducted In		Description
			Ireland Israel Jamaica Japan Kuwait	Tahiti Taiwan Thailand Trinidad, Tobago Turkey Ukraine United Arab Emirates United Kingdom Venezuela Zimbabwe	

If Honda finds additional relevant and non-privileged documents, it will supplement this response.

**REQUEST:**

35. Provide a corporate organizational chart(s) identifying the employees, by name and title, who have been involved in investigating or decision making concerning the airbag rupture issue.

**RESPONSE:**

35. Honda refers NHTSA to American Honda Motor Co., Inc. December 5, 2014 response, as amended and supplemented on December 15, 2014, to NHTSA's General Order, incorporated herein by reference.

**REQUEST:**

36. Provide a copy of any document retention policy that applies to the documents requested herein.

**RESPONSE:**

36. In response to this request, copies of responsive documents currently in Honda's possession, custody or control that are not protected from disclosure by the attorney-client privilege or attorney work-product protection doctrine and that have been located to date are

provided electronically on the concurrently submitted media, which includes a load file field that identifies the Special Order Request categories. Other documents responsive to this request may be contained in documents obtained from the ongoing review of Honda's files and records. If Honda finds additional relevant and non-privileged documents, it will supplement this response.

**REQUEST:**

37. Provide a copy of any litigation hold for documents associated with airbags manufactured in whole or in part by Takata. To the extent not identified on the face of the litigation hold, identify the date that it was put in place and identify each individual (by name and title) to whom the litigation hold applies.

**RESPONSE:**

37. Honda understands this request to relate to documents associated with front airbag inflator ruptures. Honda objects to this request to the extent that it seeks to obtain a copy of the text of the litigation holds, which are covered by the attorney-client privilege and/or work product doctrine. Honda states that it has issued such litigation holds, and is providing an initial list of the individuals who received such a hold and the date on which each such hold was issued. The list is provided electronically on the concurrently submitted media, which includes a load file field that identifies the Special Order Request categories. Honda will supplement this list on December 22 with additional recipients of the litigation holds.

**REQUEST:**

38. Provide all other documents not otherwise requested herein that refer to, relate to, discuss or concern any airbag rupture.

**RESPONSE:**

38. It is not reasonable or practicable to reconstruct all of the information necessary

to respond to this Request, particularly in the time permitted for response. Without waiving this objection, and with the understanding that Honda's review of potentially responsive materials is continuing, Honda states that it has provided in response to the other Requests in this Special Order all of the non-privileged, responsive documents that it has located to date that refer to any front airbag inflator rupture involving a Takata airbag or Takata inflator.

### **ADDITIONAL STATEMENTS**

As discussed with NHTSA counsel, Honda has construed the information requests contained in this Special Order to pertain to front airbags only, and has also construed references to "airbag rupture" to pertain to airbag inflator rupture only.

Honda is not providing privileged documents that may be responsive to this Special Order. These include (a) communications between outside counsel and employees of Honda's Law Department, other Honda employees, or employees of parties represented by Honda in litigation or claims; (b) communications between employees of Honda's Law Department and other Honda employees or employees of parties represented by Honda in litigation or claims; (c) notes and other work product of outside counsel or employees of Honda's Law Department, including work product of employees or consultants done for or at the request of outside counsel or Honda's Law Department. Honda is not claiming a legal privilege for any documents provided with this response; however, Honda does not waive the legal privilege or work product protection with respect to other documents that may have been prepared in connection with a specific litigation or claim. In addition, Honda may assert the attorney client privilege or claim protection under the work-product doctrine for analyses or other documents that may be prepared in connection with litigation or claims in the future.



In its search for responsive materials, Honda has identified numerous documents in the Japanese language. Consistent with the instructions in the Special Order, Honda is arranging for translations of each such document into English. For those documents that have been identified as responsive, the original foreign-language document will be included in this Response. However, Honda will supplement this response with the English translations when those have been completed. As is the case with all the Requests herein, Honda's efforts to identify responsive documents in both the United States and Japan remain ongoing.

Although Honda is responding to all of the requests posed by the agency and has endeavored to identify and provide all responsive documents (efforts which are ongoing), Honda is objecting to certain of the definitions, instructions and requests contained in the Special Order:

Honda objects to the definition of "documents" in the Special Order because it exceeds a reasonable understanding of the term "documents."

Honda objects to the definition of "You" and "Your" to the extent it purports to include outside counsel. It would be unduly burdensome to require Honda to request that outside counsel search files for responsive documents. Moreover, it is highly unlikely that outside counsel would possess any non-privileged documents responsive to this Special Order that are not already being produced by Honda. In light of the significant burden and cost associated with canvassing outside counsel for potentially responsive documents and the very low probability of identifying any non-privileged document not already being produced, Honda has not asked its outside counsel to search for responsive documents.

Honda understands that NHTSA will protect any private information about persons that is contained in this response, based on privacy considerations. Such private information includes

data such as names, addresses, phone or fax numbers, email addresses, license plate numbers, driver's license numbers, and the last 6 digits of the vehicle's VIN.

## AFFIDAVIT

I declare under penalty of perjury that I have undertaken and directed an inquiry reasonably calculated to assure that the answers and production of documents are complete and correct, that I have caused the documents of Honda to be searched diligently for information and documents responsive to this Special Order and produced them to NHTSA, and that, to the best of my knowledge, the answers to the inquiries provided to NHTSA respond completely and correctly to this Special Order, subject to the anticipated supplement on December 22, 2014, and any further supplements.

Executed on this 15th day of December, 2014, at Marysville, Ohio.

A handwritten signature in black ink, appearing to read 'RMS', written over a horizontal line.

**Rick Schostek**  
**Executive Vice President**  
**Honda North America, Inc.**

**AFFIDAVIT**

I declare under penalty of perjury that I have undertaken and directed an inquiry reasonably calculated to assure that the answers and production of documents are complete and correct, that I have caused the documents of Honda to be searched diligently for information and documents responsive to this Special Order and produced them to NHTSA, and that, to the best of my knowledge, the answers to the inquiries provided to NHTSA respond completely and correctly to this Special Order, subject to the anticipated supplement on December 22, 2014, and any further supplements.

Executed on this 15th day of December, 2014, at Marysville, Ohio.

A handwritten signature in black ink, appearing to read 'RMS', written over a horizontal line.

**Rick Schostek**  
**Executive Vice President**  
**Honda North America, Inc.**